



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

Mailstop 3233

September 1, 2015

VIA E-MAIL

Mr. Jon W. Clark
Chief Financial Officer
Gramercy Property Trust, Inc.
521 5th Avenue, 30th Floor
New York, New York 10175

Re: Gramercy Property Trust, Inc.
Form 10-K for the year ended December 31, 2014
Filed on March 9, 2015
File No. 001-32248

Dear Mr. Clark:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Eric McPhee

Eric McPhee
Senior Staff Accountant
Office of Real Estate and
Commodities